

1 George Haines (NV State Bar No. 9411)  
2 Gerardo Avalos (NV State Bar No. 15171)  
2 **FREEDOM LAW FIRM, LLC**  
3 8985 S. Eastern Avenue, Suite 100  
3 Las Vegas, NV 89123  
4 Telephone: 702.880.5554  
4 ghaines@freedomlegalteam.com

5 *Attorneys for Plaintiff and the Proposed Class*

6 Todd L. Bice  
7 NV State Bar No. 4534  
7 **PISANELLI BICE PLLC**  
8 400 S. 7th Street Suite 300  
8 Las Vegas, NV 89101  
9 Telephone: 702.214.2100  
9 tlb@pisanellibice.com

10 Angela C. Agrusa\*  
10 **DLA PIPER LLP (US)**  
11 2000 Avenue of the Stars  
11 Suite 400 North Tower  
12 Los Angeles, CA 90067-4735  
12 Telephone: 310.595.3000  
13 angela.agrusa@us.dlapiper.com

14 \**Pro hac vice application forthcoming*

15 *Attorneys for Defendant*  
15 *MGM Resorts International*

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18                   **UNITED STATES DISTRICT COURT**  
19                   **DISTRICT OF NEVADA**

20 MICHAEL PIRCIO, individually and on behalf  
21 of all others similarly situated,

22                   Plaintiff,

23                   v.

24 MGM RESORTS INTERNATIONAL,

25                   Defendant.

Case No. 2:23-cv-1550-CDS-NJK

**STIPULATION TO EXTEND TIME  
TO FILE DEFENDANT'S  
RESPONSE TO COMPLAINT  
(FOURTH REQUEST)**

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1 Pursuant to LR IA 6-1, Plaintiff Michael Pircio and Defendant MGM Resorts  
 2 International (“MGM”) (collectively, the “Parties”) respectfully stipulate MGM’s time to  
 3 respond to the Complaint be extended from the current deadline of January 11, 2024 to and  
 4 including March 11, 2024. This is the fourth stipulation for an extension of time to file  
 5 MGM’s responsive pleading. The court previously granted an extension on December 12,  
 6 2023. ECF No. 19.

7 Good cause exists to enlarge the time for MGM to respond to the Complaint. There  
 8 are currently twelve other related actions filed against MGM pending in the District of  
 9 Nevada (the “Related Actions”). *See Kirwan v. MGM Resorts Int’l*, No. 2:23-cv-01481;  
 10 *Owens v. MGM Resorts Int’l*, No. 2:23-cv-01480; *Lackey v. MGM Resorts Int’l*, No. 2:23-  
 11 cv-01549; *Zussman v. Vici Properties Inc., et al.*, No. 2:23-cv-01537; *Terezo v. MGM*  
 12 *Resorts Int’l*, No. 2:23-cv-01577; *Rundell v. MGM Resorts Int’l*, No. 2:23-cv-01698; *Bezak*  
 13 *v. MGM Resorts Int’l*, No. 2:23-cv-01719; *Albrigo v. MGM Resorts Int’l*, No. 2:23-cv-1981;  
 14 *Zari v. MGM Resorts Int’l*, No. 2:23-cv-01777; *Manson v. MGM Resorts Int’l*, No. 2:23-cv-  
 15 01826; *Sloan v. Vici Properties Inc., et al.*, No. 2:23-cv-02042; *Righetti v. MGM Resorts*  
 16 *Int’l*.

17 On December 6 and December 20, 2023, plaintiffs’ counsel in six consolidated  
 18 putative class actions brought against MGM by individuals who allege their PII was  
 19 compromised as a result of a cybersecurity incident involving MGM in 2019 (the “2019  
 20 Actions”) filed Notices of Related Cases Pursuant to District of Nevada Local Rule 42.1,  
 21 notifying the Court that the Related Actions are related to the 2019 Actions. *In re: MGM*  
 22 *Resorts Int’l Data Breach Litig.*, No. 2:20-CV-00376-GMN-NJK, ECF 186, 188. Plaintiffs  
 23 in this action have opposed this effort because the 2019 Actions involved a different threat  
 24 actor and different data.

25 The parties in the Related Actions are discussing this development in addition to the  
 26 consolidation of the Related Actions. As such, additional time is required to permit time to  
 27 meet and confer with the various parties to the Related Actions.

28 The Parties’ request is made in good faith to enable the parties to finalize the joint

1 motion for consolidation and conserve judicial and party resources. Moreover, this case is  
2 in its infancy, and this request will not prejudice any party.

3 **WHEREAS** the Parties respectfully request that MGM shall have until March 11,  
4 2024, to answer, move, or otherwise respond to the Complaint.

5 Dated: January 8, 2024

Respectfully submitted,

6 */s/ George Haines* \_\_\_\_\_  
7 George Haines  
8 Gerardo Avalos  
9 **FREEDOM LAW FIRM, LLC**  
10 8985 S. Eastern Avenue, Suite 100  
11 Las Vegas, NV 89123  
12 Telephone: 702.880.5554  
13 [ghaines@freedomlegalteam.com](mailto:ghaines@freedomlegalteam.com)

14 *Attorneys for Plaintiff and the Proposed*  
15 *Class*

16 */s/ Todd L. Bice* \_\_\_\_\_  
17 Todd L. Bice, #4534  
18 **PISANELLI BICE, PLLC**  
19 400 S. 7th Street Suite 300  
20 Las Vegas, NV 89101  
21 Telephone: 702.214.2100  
22 [tlb@pisanellibice.com](mailto:tlb@pisanellibice.com)

23 Angela C. Agrusa  
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25 2000 Avenue of the Stars  
26 Suite 400 North Tower  
27 Los Angeles, CA 90067-4735  
28 Telephone: 310.595.3000  
[Angela.agrusa@us.dlapiper.com](mailto:Angela.agrusa@us.dlapiper.com)

29 *Attorneys for Defendant*  
30 *MGM Resorts International*

31 **IT IS SO ORDERED:**

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33 \_\_\_\_\_  
34 Nancy J. Koppe  
35 United States Magistrate Judge

36 DATED: January 9, 2024